

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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RETURN RECEIPT REQUESTEDDEPARTMENT  
ENVIRONMENTAL QUALITY

Mr. Robert A. Bell  
Vice President, Collis Division  
Chamberlain Manufacturing Corporation  
PO Box 231  
2005 S. 19th Street  
Clinton, Iowa 52732

SHOWMAN  
3/19/2001-4931

Dear Mr. Bell:

After review of information available to the United States Environmental Protection Agency (EPA), including inspection reports, site investigation reports, and analytical data from samples taken by both EPA and the Iowa Department of Environmental Quality, it is the opinion of the EPA that the waste management activities of Chamberlain Manufacturing, Collis Division, Clinton, Iowa, both past and present, may present a substantial hazard to human health or the environment. The EPA believes that groundwater and surfacewater including the adjacent drainage ditch, Mill Creek, and the Mississippi River, may be contaminated by hazardous wastes generated by Collis. We are primarily concerned with contamination by these pollutants: cyanide, chromium, copper, nickel, zinc and mercury. These chemicals are known to cause acute and/or chronic toxic effects in humans and aquatic life. Several of the metals are known to bioaccumulate. Mercury, for example, bioaccumulates to a very high degree resulting in increasing risk to exposed aquatic organisms and to humans that consume them.

Our concerns arise for several reasons. The surface impoundments on site do not have any type of liner or leachate collection system and the groundwater is close to the bottom of the impoundments. The nature of the soils in the area would not provide a barrier to leachate from the impoundments. During the site investigation, evidence of migration of an oily waste was observed; although that particular waste may not be hazardous, this fact indicates the other wastes which are hazardous may be migrating through the soils. On several occasions, the drainage ditch adjacent to Collis property has contained a visual sludge blanket. EPA believes that this is caused by malfunctions in the operation of the wastewater treatment system which result in release of contaminants through the outfall and by surface runoff from the facility. The surface runoff is a concern because of the numerous spills and leaks of hazardous materials which have occurred on site. Further, the runoff has been contaminated by the overflow of the sludge lagoons and the sludge which has been dredged from the lagoons and piled beside them.

CONCURRENCES				
SYMBOL	LEGL	LEGL	LEGL	ENFC
SURNAME	MICHAEL	MICHAEL	MICHAEL	ARAM-HAZM
DATE	10-27-81	10-27-81	10/29/81	10/29/81



R00312917  
RCRA RECORDS CENTER

In an effort to more fully determine the extent of environmental problems which have resulted from your waste management practices, the EPA is requesting that the Collis Division undertake a program of sampling and analysis of soils, surfacewater and groundwater. This would include the installation of groundwater monitoring wells and reporting these and other sampling results regularly to EPA.

As the initial step under this program, we ask that you submit a written proposal, similar to the proposal described in Section 3013 of the Resource Conservation and Recovery Act (as amended) 42 U.S.C. Section 6934. This proposal should address sampling and monitoring necessary to assess the nature and extent of contamination of the groundwater, the rate and routes of spread of such contamination, and the effects of contamination on aquatic life downgradient from your facility. We ask that this proposal be submitted to the undersigned within 30 days of receipt of this letter. In order for the EPA to be better able to evaluate your proposal, we also ask that you provide any information available to you regarding the ability of the overlying unconsolidated sediments and soils to prevent contamination from reaching the bedrock aquifer system.

We would like to discuss such a proposal with a representative of Collis Division and your attorney. If you desire such a conference, please contact Cheryle Micinski, Attorney, Legal Branch, telephone number (816) 374-7142, within two weeks. She is the person on my staff most familiar with this case. Your cooperation in this matter is appreciated.

Sincerely yours,

Louise D. Jacobs  
Director, Enforcement Division

ENFC/LEGL/CLMicinski:ksh:10-26-81:Doc.2627A

bcc: Charles Miller, IDEQ  
Dave Crawford, ARHM/TSS  
Jack Morse, CNSL